

Hearing Date: March 21, 2023 at 10:00 am
Objection Deadline: March 14, 2023 at 4:00 pm

Víctor Ubierna de las Heras
Pro se creditor
Telephone: +34 699760721
Email: victorub@protonmail.com

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
CELSIUS NETWORK LLC, <i>et al.</i> , ¹	:	Case No. 22-10964 (MG)
	:	Jointly Administered
Debtors.	:	
	:	
	:	Re: Dkt. No. 2151, 2218 and 2224
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**JOINDER AND SUPPLEMENT TO OBJECTION OF THE UNITED STATES TRUSTEE
TO DEBTORS' MOTION FOR AN ORDER (I) AUTHORIZING AND APPROVING
CERTAIN BID PROTECTIONS FOR THE PROPOSED PLAN SPONSOR AND
(II) GRANTING RELATED RELIEF and JOINDER TO JOINDER AND SUPPLEMENT
FILED BY IGNAT TUGANOV**

Víctor Ubierna de las Heras, *pro se* creditor, hereby submits this Joinder and Supplement (this "Joinder") to the *Objection of the United States Trustee to Debtors' Motion For An Order (I) Authorizing and Approving Certain Bid Protections for the Proposed Plan Sponsor and (II) Granting Related Relief* filed with docket number 2218 and to the *Joinder And Supplement To Objection Of The United States Trustee To Debtors' Motion For An Order (I) Authorizing And Approving Certain Bid Protections For The Proposed Plan Sponsor And (Ii) Granting Related Relief* filed by counsel to Ignat Tuganov filed with docket number 2224 and respectfully

¹ 1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

represents as follows:

JOINDER

4. Víctor Ubierna de las Heras joins in the United States Trustee's Objection in all respects.
5. Víctor Ubierna de las Heras joins Ignat Tuganov in his Joinder and Supplement in all respects. He is completely right in his request that the Court allow creditors to amend their proof of claims after the Decision regarding customer claims.

SUPPLEMENT

6. Debtors should also disclose what will happen to customers in unsupported jurisdictions inside the United States of America and to customers in another countries, specifically to those in the 27 countries of the European Union and how could this affect the proposed transaction for which they seek protections.

7. Debtors should also disclose how withdrawals amounts will be calculated, if claims are to be dollarized (as one group fought for earlier in the case) and how fluctuations on cryptocurrencies prices is to have an impact on this and the proposed bid.

8. Apparently, some creditors have received a revised term sheet from the estate fiduciaries yesterday evening at 11:51 pm (as said by one Ad Hoc group in docket 2225). Until all creditors and parties, not only some, have had the opportunity to study the revised term sheet and due process has been complied with, this Court should not rule on the Motion and should allow for this joinder and supplement to be amended.

9. For the reasons stated herein and in dockets 2218 and 2218, Víctor Ubierna de las Heras respectfully ~~requests~~ that the Motion be denied.

Dated: March 14, 2023

Madrid, Spain

Respectfully submitted,

Víctor Ubierna de las Heras
By: /s/ Víctor Ubierna de las Heras

Víctor Ubierna de las Heras
Pro se creditor
+34 699760721
victorub@protonmail.com